

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS, SCOTT  
TUROW, and RACHEL VAIL, individually  
and on behalf of others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC,  
OPENAI GP LLC, OPENAI, LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION LLC,  
OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, OPENAI STARTUP FUND  
MANAGEMENT LLC, and MICROSOFT  
CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE  
LINDEN, DANIEL OKRENT, JULIAN  
SANCTON, HAMPTON SIDES, STACY  
SCHIFF, JAMES SHAPIRO, JIA  
TOLENTINO, and SIMON WINCHESTER, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC,  
OPENAI GP, LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, OPENAI STARTUP FUND  
I LP, OPENAI STARTUP FUND GP I LLC,  
OPENAI STARTUP FUND MANAGEMENT

Consolidated Cases:

Case No. 1:23-cv-08292-SHS

Case No. 1:23-cv-10211-SHS

Case No. 1:24-cv-00084-SHS

**NOTICE OF MOTION AND  
MOTION FOR ADMISSION *PRO*  
*HAC VICE***

LLC, and MICROSOFT CORPORATION,  
Defendants.

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANES (professionally known as  
Nicholas Gage), individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI GP, L.L.C., OPENAI  
HOLDINGS, LLC, OAI CORPORATION,  
LLC, OPENAI GLOBAL, LLC, OPENAI,  
L.L.C., and OPENAI OPCO, LLC,

Defendants.

PURSUANT TO Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Carrie A. Beyer, hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned actions. I am in good standing of the bar of the State of Illinois and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

**FAEGRE DRINKER BIDDLE & REATH LLP**

Dated: Chicago, Illinois  
July 11, 2024

By: /s/ Carrie A. Beyer

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*Attorneys for Microsoft Corporation*